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September 13, 2017

Via First Class Mail and Electronic Mail foster.anne@epa.gov

Anne Foster
United States Environmental Protection Agency (EPA) Region 6
1445 Ross Avenue, Suite 1200
Mail Code: 6RC
Dallas, TX 75202-2733

Re: San Jacinto River Waste Pits Superfund Site (Site)

Dear Anne:

Following up on your letter of yesterday, International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC) received the attached EPA's proposed Sampling and Analysis Plan (SAP) mid-morning today. Essentially, the proposed plan is inconsistent with your promise that EPA would not cause a release that would not otherwise have occurred. For example, the SAP proposes using a sledge hammer as part of the protocol. Our more specific comments are presented below.

Consistent with your letter, the sampling should not result in piercing the existing cap to collect a sample. Respondents strongly assert that if EPA locates any area(s) where cap material does not appear to be present, collecting a sample as proposed makes no logical sense and may only cause a release that does not exist. It would be appropriate, instead, to collect a sample of materials that have accumulated on top of the cap. There are several areas in the northwestern portion of the cap that have these accumulations. Similar to sediment sampling on areas of the western cell and along the shoreline of the eastern cell that was directed by EPA over the past week, EPA should collect surface sediments on cap materials beneath the water surface using a four or eight ounce sample jar. A spoon or spatula should be used to scrape those surface sediments into the jar and the top of the jar should be secured immediately to prevent sample loss as the diver brings the sample to the boat.

The references to the "Sediment Field Sampling Plan April 2010, San Jacinto River Waste Pits Superfund Site (Integral Consulting Inc. and Anchor QEA, LLC, 2010)"

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is inappropriate as this plan did not address the proposed sampling contemplated by EPA in the SAP.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert R. Axe". The signature is fluid and cursive, with the first name "Albert" and last name "Axe" clearly legible.

Albert R. Axe, Jr.

ARA:mr
Attachment

cc: Sam Coleman
Carl Edlund
Carlos Sanchez
Gary Miller
David Keith
John F. Cermak, Jr.
Sonja A. Inglin

U.S. Environmental Protection Agency - Environmental Response Team (ERT)

Diver Sediment Sampling Procedures

BACKGROUND

The San Jacinto River Waste Pit Site history has been documented in several documents prepared for, submitted to, and approved by the EPA. In brief, paper mill wastes were disposed in impoundments about 14 acres in size at the site in the 1960's resulting dioxin and furan contamination in the adjacent waterbody of the San Jacinto River. The impoundments/waste pits are situated on a 20-acre parcel immediately north of Interstate Highway 10 on the west bank of the river.

Pursuant to an EPA-issued Order on Consent (AOC), International Paper Company (IPC) and McGinnes Industrial Maintenance Corporation (MIMC) undertook a Time Critical Removal Action (TCRA). As a central component of that action, IPC and MIMC implemented action to stabilize the waste pits and to install the TCRA Cap. The original 1966 boundaries of the northern impoundments/waste pits and impacted area extend into the current basin of the San Jacinto River, and thus a portion of the cap is underwater in depths extending to a maximum of approximately 16 feet. The TCRA Cap is designed to prevent the migration of dioxins and furans from the historic boundaries of the northern impoundment into the San Jacinto River and its sediments.

METHODOLOGY

Sediment samples will be collected by U.S. Environmental Protection Agency (EPA) certified scientific divers as specified in U.S. EPA ERT/Scientific, Engineering, Response & Analytical Services (SERAS) SOP 2016 "*Sediment Sampling*" (U.S. EPA 2001) and Sediment Field Sampling Plan April 2010, San Jacinto River Waste Pits Superfund Site (Integral Consulting Inc & Anchor QEA, LLC, 2010).

A diver will assess the sediments at the San Jacinto Waste Pits site using a 4-foot probe (e.g., rebar) looking for areas where armor stone or geotextile material is not observed in the upper 4 feet of the sediment. These locations will be designated with a surface marker buoy. Once one or more potential target areas are located the diver will return to the surface to get sediment sampling equipment. The sediment sampling equipment will consist of a polycarbonate tube (or similar material), sledge hammer (if required) and two plastic end caps.

The diver will descend back to the sample location and the 12- inch long tube will be inserted vertically into the sediment to a depth of 6-inches below the top of the sediment surface. The tube will be marked with thick tape at 6-inches so the diver can feel when the tube is inserted 6-inches into surficial sediments. Once the tube is pushed to the desired depth a plastic end cap will be tightly placed on the top of the tube, which minimizes any loss of sediment sample from the bottom of the tube. The tube will be slowly pulled vertically from the sediment, keeping the plastic end cap intact. When the bottom of the tube is just above the sediment surface it will be immediately capped. The sediment sample will be handed from the diver to surface personnel on

the dive support vessel. The sediment sample will be labelled with sample location, sample date/time and a directional arrow pointing to the top of the tube. Throughout collection and transportation, the tube will be maintained in an upright vertical position to minimize disturbance of the sediments.

After being transported to the processing area, the sediments in tubes will be allowed to settle and a small (1/8") hole will be drilled above the sediment/water interface. After the overlying water has been drained the sediment will be transferred to a dedicated aluminum pan and homogenized with a dedicated stainless-steel spoon until the sediment attains a visually uniform color and texture. The sediment will be transferred to a labeled sample container. Each sample container will be labeled with the sample location and sample time/date. Samples will be maintained and shipped to the laboratory for analysis on wet ice at 4°C.

REFERENCES

Anchor QEA and Integral Consulting. 2010. Sediment Field Sampling Plan San Jacinto River Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. Anchor QEA, Ocean Springs, MS.

USEPA. 2001. U.S. EPA ERT SERAS Standard Operating Procedure (SOP) 2016 'Sediment Sampling' Washington, DC. <https://clu-in.org/download/ert/2016-R00.pdf>